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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
(HONORABLE WILLIAM Q. HAYES)

UNITED STATES OF AMERICA,)	CASE NO.08CR0724-WQH
)	
Plaintiff,)	DATE: April 21, 2008
)	TIME: 2:00 p.m.
v.)	
)	NOTICE OF MOTIONS AND
JOSE ELIAS CAMACHO-MELENDEZ,)	MOTIONS:
)	
Defendant.)	(1) TO COMPEL
)	DISCOVERY/PRESERVE
)	EVIDENCE;
)	(2) TO DISMISS THE INDICTMENT
)	DUE TO MISINSTRUCTION OF
)	THE GRAND JURY;
)	(3) AND; GRANT LEAVE TO FILE
)	FURTHER MOTIONS
)	
)	
)	

**TO: KAREN P. HEWITT, ACTING UNITED STATES ATTORNEY, AND
LAWRENCE CASPER, ASSISTANT UNITED STATES ATTORNEY:**

PLEASE TAKE NOTICE that on April 21, 2008, at 2:00 p.m. or as soon thereafter as
counsel may be heard, the defendant, Jose Camacho-Melendez, by and through his counsel, Kasha
K. Pollreisz and Federal Defenders of San Diego, Inc., will ask this Court to enter an order granting
the following motions.

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MOTIONS

The defendant, Jose Camacho-Melendez, by and through his attorneys, Kasha K. Pollreisz and Federal Defenders of San Diego, Inc., pursuant to the United States Constitution, the Federal Rules of Criminal Procedure, and all other applicable statutes, case law and local rules, hereby moves this Court for an order:

- 1) to compel discovery/preserve evidence;
- 2) dismiss the Indictment due to misinstruction of the Grand Jury; and
- 3) for leave to file further motions.

These motions are based upon the instant motions and notice of motions, the attached statement of facts and memorandum of points and authorities, and all other materials that may come to this Court's attention at the time of the hearing on these motions.

Respectfully submitted,

/s/ Kasha K. Pollreisz

Dated: April 1, 2008

KASHA K. POLLREISZ
Federal Defenders of San Diego, Inc.
Attorneys for Mr. Camacho-Melendez
Kasha_Pollreisz@fd.org